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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**STIPULATION REGARDING
DISCOVERY OF COMMUNICATIONS
BETWEEN COUNSEL AND FACT AND
EXPERT WITNESSES**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

COORDINATION PROCEEDING SPECIAL
TITLE [RULE 3.400]

SOCIAL MEDIA CASES

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 5255

For Filing Purposes: 22STCV21355

Judge: Hon. Carolyn B. Kuhl
SSC-12

THIS DOCUMENT RELATES TO:

ALL ACTIONS

*(Christina Arlington Smith, et al., v. TikTok
Inc., et al., Case No. 22STCV21355)*

**STIPULATION REGARDING
DISCOVERY OF COMMUNICATIONS
BETWEEN COUNSEL AND FACT AND
EXPERT WITNESSES**

STIPULATION

MDL Plaintiffs (including PI/SD Plaintiffs and the State AGs), JCCP Plaintiffs, and Meta Defendants (collectively, the “Parties”) stipulate and agree as follows:

1. Meta Defendants withdraw any and all pending requests for written communications between counsel for Plaintiffs in the Actions, on one hand, and any Fact Witnesses or Expert Witnesses, on the other, including but not limited to Meta’s requests for such communications from the MDL State AGs and from former Meta employees, including Arturo Bejar, Frances Haugen, Vaishnavi Jayakumar, and Alison Lee. As such, the recipient of any such request(s) from Meta is not required to produce or to log any such communications in response to the request(s).

2. Plaintiffs withdraw any and all pending requests for written communications between counsel for Meta Defendants in the Actions, on one hand, and any Fact Witnesses or Expert Witnesses, on the other, including but not limited to the MDL State AGs’ requests for such communications from Meta. As such, Meta is not required to produce or to log any such communications in response to any such request(s).

3. Following the close of fact discovery on April 4, 2025, the Parties agree not to serve any document requests seeking the disclosure of, and no Party or third party is required to produce or to log, written communications between **In-House Counsel** or **Outside Counsel** for any Party in MDL 3047 or JCCP 5255 (together, the “Actions”), on one hand, and individuals who are Fact Witnesses or Expert Witnesses in the Actions, on the other.

4. Definitions. The bolded terms above have the meaning given to them in the Stipulated Third Modified Protective Order entered in the MDL (ECF 1209). The capitalized terms above have the following meanings:

Fact Witness: any person who provides fact testimony in the Actions (including Rule 30(b)(6) or Person-Most-Qualified deposition testimony or trial testimony).

Expert Witness: any person who has been retained, designated, or disclosed by a Party as an expert witness or consultant in the Actions (including both retained and non-retained experts).

5. This stipulation does not relieve any Party of any obligation to disclose, with respect to Expert Witnesses, (i) facts or data that the Expert Witness considered, or assumptions that Expert Witness relied on, in forming the opinions to be expressed and (ii) compensation for the Expert Witness's study or testimony.

Respectfully submitted,

DATED: July 15, 2025

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 15, 2025

By: /s/ Ashley M. Simonsen
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